
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Mag. No. 15-1511
v. :
CLIFF RAMSAY : HON. DOUGLAS E. ARPERT
: : **CRIMINAL COMPLAINT**

I, Kevin Matthews, being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this Complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.



Kevin Matthews, Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,
on July 28, 2015, at Trenton, New Jersey



HONORABLE DOUGLAS E. ARPERT
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

Count 1

On or about February 27, 2015, in Somerset County, in the District of New Jersey, and elsewhere, defendant

CLIFF RAMSAY

did knowingly access child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that had been mailed, and using any means and facility of interstate and foreign commerce, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Section 2252A(a)(5)(B).

Count 2

On or about July 28, 2015, in Somerset County, in the District of New Jersey, and elsewhere, defendant

CLIFF RAMSAY

did knowingly possess child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that had been mailed, and using any means and facility of interstate and foreign commerce, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Section 2252A(a)(5)(B).

ATTACHMENT B

I, Kevin Matthews, am a Special Agent with the Federal Bureau of Investigation ("FBI"). I have knowledge of the following facts based upon both my investigation and discussions with other law enforcement personnel. Because this affidavit is being submitted for the sole purpose of establishing probable cause to support the issuance of a Complaint, I have not included each and every fact known to the government concerning this matter. Where statements of others are set forth herein, these statements are related in substance and in part.

1. At all times relevant to this Complaint, defendant CLIFF RAMSAY (hereinafter, "RAMSAY") was a resident of Raritan, New Jersey.

2. In or around February and March 2015, law enforcement agents identified an Internet Protocol ("IP") address assigned to a computer using a website known by law enforcement to contain images, videos, and other material containing child pornography. Based on its investigation, law enforcement identified the unique username of the user (the "User") who accessed the website using the identified IP address.

3. On or about February 25, 2015, and February 27, 2015, the User logged onto the website and accessed, among other things, the following materials related to child pornography:

- a. February 25, 2015. A link to an image that appears to depict 16 thumbnail images from a video. All of the images depict a naked prepubescent, Caucasian female. The female is in several provocative positions. Two thumbnail images are close up images of the prepubescent girl's vagina. Her legs are spread in a few other thumbnail images exposing her vagina to the viewer of the image.
- b. February 27, 2015. An image that appears to depict 15 thumbnail images from a video. The thumbnail images appear to depict two prepubescent Caucasian females in a bedroom. One of the thumbnail images appears to depict one of the prepubescent girls with her legs spread and her vagina exposed to the viewer of the image. Another thumbnail image appears to depict one of the prepubescent girls on her hands and knees with her buttocks facing the viewer of the image and the other prepubescent girl's hand near the other girl's buttocks. The other prepubescent girl is kneeling in front of the girl with the white shirt and her head is in front of the white shirted girl's vagina.

c. February 27, 2015. An image that appears to depict 24 thumbnail images from a video. All of the thumbnail images depict a naked prepubescent Caucasian female. Her vagina is exposed to the viewer of the image in a number of the thumbnails. Other thumbnail images depict the prepubescent female posing in provocative positions.

4. Law enforcement officers determined that the IP address of the computer used to access the website was assigned to an Internet account registered to an address in Raritan, New Jersey, at which defendant RAMSEY resided (the "Residence").

5. On or about July 28, 2015, law enforcement officers executed a search warrant at the Residence. The officers recovered a computer belonging to defendant RAMSAY that had been used to access the website as described in paragraphs 2 and 3 above. Among the files law enforcement officers located on the computer were numerous files containing images and videos of child pornography, as defined by Title 18, United States Code, Section 2256(8), including material depicting prepubescent minors engaged in sexually explicit conduct. For example, files recovered from the computer include, but are not limited to, the following:

- a. A 52-second color video depicting three females, one of whom is prepubescent and the other two appear to be under the age of 18. The video depicts the females each wearing a towel, two in blue-printed towels and one in a red-printed towel. They also have a yellow comforter with white flowers and appear to be on a brown-colored couch. The females remove their towels and begin dancing around. At approximately 32 seconds into the video, the prepubescent female lays on her back and lifts her legs above her torso while one of the other females spreads her vagina apart. The video then zooms into the prepubescent girl's vagina and zooms back out.
- b. A color image depicting a naked, prepubescent female with blond hair. The female is kneeling on a wooden floor with her hands on her knees. Her knees are spread apart, exposing her vagina.
- c. A color image of a naked prepubescent female with blond hair wearing black and silver high heels. The female is crouching on a shore with water in the background. Her knees are spread apart, exposing her vagina.

d. A color image of a naked, prepubescent female with brown hair wearing a red and silver bracelet and a red and silver piece of jewelry around her waist. The female is outside lying on the ground on what appears to be rocky ground with green vegetation in the background. She is leaning on her right arm with her right leg lying on the ground and her left leg extended into the air, exposing her vagina.

6. On or about July 28, 2015, during an interview with law enforcement officers, and after being advised of and acknowledging his *Miranda* rights, defendant RAMSAY admitted, among other things, that (i) he was the User as set forth in paragraph 2, above; (ii) he knowingly possessed the images of the kind described in paragraph 5, above; (iii) the computer from which law enforcement officers recovered images of child pornography belonged to him; and (iv) he used that computer to access the website described in paragraphs 2 and 3, above.

7. Based upon my education, training and experience, and my discussions with other law enforcement officers, and to the best of my knowledge, the images and videos described in paragraphs 3 and 5 above traveled in interstate commerce and were produced using materials that were mailed and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.